

**BOULT
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CONNERS
& BERRY** PLC

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July 5, 2000

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EXECUTIVE SECRETARY

David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Petition for Arbitration of BlueStar Networks, Inc. with BellSouth
Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996
Docket No. 99-00945

Dear David:

Please accept for filing the original and thirteen copies of BlueStar Networks, Inc.'s responses to BellSouth Telecommunications, Inc.'s interrogatories and requests to produce in the above-captioned proceeding.

Also, please make a note of BlueStar Network's recent address change:

BlueStar Networks, Inc.
801 Crescent Center Drive, Suite 600
Franklin, TN 37068
Phone: 778-7350

Thank you for your attention to these matters.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/nl

cc: Norton Cutler
Guy Hicks

POSTED
7-6-00

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

REC'D TH
REGULATORY AUTH.

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OFFICE OF THE
EXECUTIVE SECRETARY

In Re:)
)
Petition for Arbitration of)
Bluestar Networks, Inc. with)
BellSouth Telecommunications,)
Inc. Pursuant to the)
Telecommunications Act of 1996)

Docket No. 99-00945

**BLUESTAR NETWORKS, INC.'S RESPONSES TO BELL SOUTH
TELECOMMUNICATIONS, INC.'S INTERROGATORIES AND REQUESTS TO
PRODUCE**

Bluestar Networks, Inc. (BlueStar) responds to BellSouth Telecommunications, Inc.'s Interrogatories and Requests to Produce filed on May 3, 2000 as follows:

RESPONSES TO INTERROGATORIES

1. In the Issues Matrix filed April 27, 2000, BlueStar states that the rates for the manual use of the Loop Make-up Service Inquiry ("LMUSI") process should not exceed the rate for electronic access to loop make-up databases. Please state in detail the explanation for this position.

Response: BlueStar believes that the parties have agreed to the terms for settlement of Issue 5. Therefore, no response to this interrogatory is necessary at this time. If BellSouth disagrees that Issue 5 is settled, BlueStar will supplement this response.

2. Do you contend that the LMUSI process, when performed electronically and manually have the same cost basis? If so, explain your rationale for this contention?

Response: BlueStar believes that the parties have agreed to the terms for settlement of Issue 5. Therefore, no response to this interrogatory is necessary at this time. If BellSouth

disagrees that Issue 5 is settled, BlueStar will supplement this response.

3. In the Issues Matrix filed April 27, BlueStar contends that if it places a loop order after using the LMUSI, the charge for the LMUSI should be applied to the ordered loop's nonrecurring charge. Please explain in detail your rationale for this position.

Response: BlueStar believes that the parties have agreed to the terms for settlement of Issue 5. Therefore, no response to this interrogatory is necessary at this time. If BellSouth disagrees that Issue 5 is settled, BlueStar will supplement this response.

4. In BlueStar's Petition, it takes the position that when its orders for ADSL loops are rejected, these loop orders should be automatically converted to UCL orders. This position is not set forth in the Issues Matrix filed April 27, 2000. Has BlueStar abandoned this issue in this arbitration?

Response: BlueStar believes that the parties have agreed to the terms for settlement of Issue 5. Therefore, no response to this interrogatory is necessary at this time. If BellSouth disagrees that Issue 5 is settled, BlueStar will supplement this response.

5. In the Issues Matrix filed April 27, BlueStar contends that "the appropriate rates for an unbundled copper loop should not exceed the rates for voice grade loops." Please explain in detail your rationale for this position.

Response: BlueStar will provide a detailed explanation for its position in its direct testimony to be filed with the Authority.

7. In the Issues Matrix filed April 27, BlueStar sets forth certain rates for loop conditioning. Please describe in detail the basis for these proposed rates and the reason that you believe these rates to be appropriate.

Response: BlueStar will provide a detailed explanation for its position in its direct testimony to be filed with the Authority.

8. In the Issues Matrix filed April 27, 2000, BlueStar states proposed nonrecurring rates for the cross connection that is the subject of Issue 16. Please describe in detail the basis for these proposed rates and the reason that you believe these rates to be appropriate.

Response: BlueStar will provide a detailed explanation for its position in its direct testimony to be filed with the Authority.

PRODUCTION REQUESTS

1. Please produce any cost studies, information, data, or analysis in your possession that relates to the cost-based rate for the LMUSI process when performed manually.

Response: BlueStar believes that the parties have agreed to the terms for settlement of Issue 5. Therefore, no response to this document request is necessary. Moreover, BlueStar does not possess any responsive documents. BlueStar notes that various regulatory authorities have addressed rates for manual access to loop make-up information.

2. Please produce any cost studies, information, data or analysis in your possession that relates to the cost-based rate for the LMUSI process when performed electronically.

Response: BlueStar believes that the parties have agreed to the terms for settlement of Issue 5. Therefore, no response to this document request is necessary. Moreover, BlueStar does not possess any responsive documents. BlueStar notes that various regulatory authorities have addressed rates for electronic access to loop make-up information.

3. Please produce any cost studies, analysis, data, or other information in your possession that supports, rebuts or any way relates to your answer to Interrogatory No. 7.

Response: BlueStar does not possess any responsive documents. BlueStar notes that various regulatory authorities have addressed rates for loop conditioning.

4. Please produce any cost studies, analysis, data, or other information in your possession that supports, rebuts or any way relates to your answer to Interrogatory No. 8.

Response: BlueStar does not possess any responsive documents.


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing BlueStar Networks, Inc. Bluestar Networks, Inc.'s Responses To BellSouth Telecommunications, Inc.'s Interrogatories And Requests To Produce has been furnished by (*) hand delivery or U.S. Mail to the following parties this 5th day of July, 2000:

(*) Honorable Gary Hotvedt, Hearing Officer
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Guy M. Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300

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J. Phillip Carver
General Attorneys
Suite 4300. BellSouth Center
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Henry Walker